

PRIVACY POLICY

Carty & Company Inc. recognizes and respects the privacy expectations of its clients and is committed to safeguarding its clients "Nonpublic Personal Information" which is nonpublic information about a client the Account Representative obtains in connection with providing a client with a financial product or service for a client's personal, family, or household purposes. These privacy disclosures apply to former and current clients, and to individuals who have provided the Account Representative with Nonpublic Personal Information but who have not become customers.

INFORMATION COLLECTED

The Representative collects client information from the following sources: (1) information on account documents or other forms, which may include a client's name, address, tax identification number, age, marital status, number of dependents, assets, debts, income, employment history, beneficiary information and personal bank account information; (2) information from the client's transactions with the Representative, such as account history or balance; and (3) correspondence, whether written, telephone or electronic, between the client and the Representative.

INFORMATION DISCLOSED

The Representative does not disclose any Nonpublic Personal Information about a client to non-affiliated third parties, except to service providers and as otherwise permitted by law. In the normal course of business all of the Nonpublic Personal Information that the Representative collects about a client, as described above, may be shared with other persons who provide services in connection with the account (including brokers, administrators, custodians, accountants or attorneys, as well as any other service providers for the account). The Representative may also disclose personal information with non-affiliated entities and regulatory authorities as permitted by applicable law. The Representative may disclose such information to cooperate with the regulatory authorities and law enforcement agencies and as necessary to protect the Representative's rights and property.

ANTI-MONEY LAUNDERING REQUIREMENTS

THE USA PATRIOT ACT

The USA Patriot Act is an acronym for Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism. The USA Patriot Act was passed by Congress as a response to the terrorist attacks on September 11, 2001.

WHAT IS MONEY LAUNDERING?

Money laundering is the generic term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have derived from a legitimate source.

The processes by which criminally derived property may be laundered are extensive. Though criminal money may be successfully laundered without the assistance of the financial sector, the reality is that hundreds of billions of dollars of criminally derived money is laundered through financial institutions, annually. The nature of the services and products offered by the financial services industry (namely managing, controlling and possessing money and property belonging to others) means that it is vulnerable to abuse by money launderers.

REQUIREMENTS TO HELP DETER MONEY LAUNDERING

To help the government fight the funding of terrorism and money laundering, we are required to ask you to provide various identification documents or other information when opening or updating an account which may include but is not limited to your name, address, date of birth (for individuals), social security number and driver's license or passport information.